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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA, ) No. CR 16-00440 WHA  
14 Plaintiff, )  
15 v. ) UNITED STATES' WITNESS LIST  
16 YEVGENIY ALEXANDROVICH NIKULIN, ) Trial: March 9, 2020  
17 Defendant. ) Pretrial Conference: February 26, 2020  
Time: 2:00 p.m.  
Courtroom No. 12  
18  
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20 The United States hereby gives notice to the Court and the defendant of the witnesses it may call  
21 in its case-in-chief in the above-captioned case. This list is intended to be inclusive, is subject to  
22 amendment or supplementation as trial preparations progress, and does not necessarily reflect the order  
23 in which the government will call the witnesses. The government will notify the defense and Court of  
24 any changes to this list.

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1 Witness Name	Anticipated Testimony
2 FBI Special Agent Jeffrey Miller	3 Special Agent Miller will testify regarding the investigation of defendant's computer intrusions at LinkedIn, Dropbox, Formspring, Automattic, and elsewhere. He will also testify regarding defendant's trafficking of credentials stolen from Formspring. 4 5 Special Agent Miller may also testify as an expert with regard to the forensic examination of the computer belonging to Oleksander Ieremenko and the market for stolen credentials, as reflected in the government's separate disclosure of expert testimony.
6 FBI Special Agent Bryant Ling	7 Special Agent Ling will testify as an expert regarding the defendant's intrusion into and use of Nicholas Berry's computer, as reflected in the government's separate disclosure of expert testimony.
8 FBI Supervisory Special Agent Emily Odom	9 Special Agent Odom will testify regarding the identification of defendant's co-conspirators.
10 Barry Abrahamson	11 Mr. Abrahamson is a "Systems Wrangler" at Automattic. He will testify regarding the defendant's computer intrusion at Automattic, which may include expert testimony regarding analysis of logs and other evidence, as reflected in the government's separate disclosure of expert testimony.
12 Ade Olonoh	13 14 Mr. Olonoh, formerly the Chief Executive Officer of Formspring, will testify regarding defendant's intrusion into Formspring computers and trafficking of Formspring credentials. This may include expert testimony regarding Formspring's system and his analysis of logs and other evidence, as reflected in the government's separate disclosure of expert testimony.
15 Matt Cudworth	16 17 Mr. Cudworth, the former Chief Technology Officer of the successor to Formspring, will testify regarding his confirmation of stolen Formspring credentials.
18 John Sanders	19 20 Mr. Sanders, formerly of Formspring, will testify regarding defendant's use of Sanders' credentials in connection with the computer intrusion at Formspring.
21 Corey Louie	22 23 Mr. Louie was formerly in Trust, Safety, and Security at Dropbox. He will testify regarding the investigation into defendant's computer intrusion at Dropbox.
24 Nicholas Berry	25 26 Mr. Berry, an employee of LinkedIn, will testify regarding defendant's use of Berry's computer and credentials in connection with the computer intrusion at LinkedIn.
27 Ganesh Krishnan	28 Mr. Krishnan, formerly LinkedIn Senior Director of Engineering, will testify regarding his investigation of defendant's computer intrusion at

	LinkedIn.
1 2 3 4 5 6 7	Bruno Connelly  Mr. Connelly, an employee of LinkedIn, will testify regarding the investigation of defendant's computer intrusion at LinkedIn.  Mr. Connelly may also testify as an expert regarding LinkedIn's systems and his analysis of logs and other records of defendant's intrusions at LinkedIn, as reflected in the government's <u>separate disclosure of expert testimony</u> .
Alexander Kuznetsov	Mr. Kuznetsov will testify regarding defendant's background and address.

DATED: December 4, 2019

Respectfully submitted,

DAVID L. ANDERSON  
United States Attorney

/s/  
MICHELLE J. KANE  
Assistant United States Attorney